REMARKS

The present application is U.S. Patent Application Serial No. 10/040,397. Claims 4-96 are pending in this application of which Claims 20, 21, 22, 24 and 47 are currently amended. Claims 20-22 are amended to correctly reference the claim from which they depend. Claims 24 and 47 are amended to correct grammatical and spelling errors.

Claim Objections

Claims 24 and 47 were objected to in the current office action due to a punctuation and a spelling error, respectively. The Applicants thank the Examiner for pointing out these errors and has amended Claims 24 and 47 as suggested by the Examiner.

Claim Rejections under 35 USC § 112

Claims 20, 21, and 22 were rejected in the current office action on the basis that there was insufficient antecedent basis for the claim limitation "the customizable tab-over property."

The Applicants have amended these claims to recite "tab-order" rather than "tab-over" in order eliminate the lack of antecedent basis pointed out by the Examiner.

Claim Rejections under 35 USC §102

Claims 4, 5, 7 and 8 were rejected under 35 U.S.C. 102(e) as being anticipated by Evans et al. (US 6,266,675).

Regarding Independent Claim 4:
Claim 4 recites,

4. (Previously Presented) A system for developing an application user interface, the system comprising:

an integrated development environment configured for a developer to specify a user interface element in the application user interface, the user interface element having a user customizable property, the application user interface being configured as an interface between an internet application and a user;

an application designer configured to produce metadata characterizing the customizable property; and

a data repository including a data record associated with the customizable property, the data record being modifiable by a user of the internet application and accessible using the metadata.

With regard to Claim 4, the Examiner suggests that Evans Col 13 lines 60-67 and Col 4 lines 1-17 teach the recited limitations.

The Applicants respectfully point out that the system and methods of Evans appear to be limited to an application that is configured by an administrator and then used in that configured form by end users referred to as case managers. In contrast with the limitations of Claim 4, the Applicants are unable to identify any teaching within Evans that suggests that a user of the application user interface (e.g., case manager or doctor) is further capable of modifying the application user interface once defined by an administrator.

The type of system taught by Evans is discussed in paragraphs 5, 7 and 10 of the Background section of the specification as filed. As stated therein, such a system results in a fixed interface that cannot be further customized by an end user to fit their particular needs. As such, design considerations are necessarily focused on a standard user without the possibility of further customization by individual users to meet their particular needs.

The ability of a user to further customize an interface for their particular needs is one of the several advantages of various embodiments of the invention. As described in detail below, it is the position of the Applicants that these distinctions between Evans and the claimed invention are properly delineated by the limitations of the claims.

It is the position of the Applicants that Evans does not teach a "*user interface element having a user customizable property*" as recited in Claim 4. The sections of Evans cited by the Examiner appear to be concerned with actions that occur during an initial setup of a database rather than as a later personalization or customization for the benefit of a particular user on an application user interface. These actions are performed by a developer with authority to set up an application, not a user of the resulting interface and application. Specifically, the text cited by the Examiner is a description of Fig. 9 of Evans which illustrates "a method 900 for generating ... configuration data" and "selecting the activity fields for each activity to include in the CM database" (Col 13 lines 60-65). This text appears to refer to an initial setup of the client manager database whose fields are later reflected in a user interface. The party who performs these steps is the same party who "selects ... the window where the case manager ... can select the activity" (Col. 14 lines 4-7). Applicants interpret this text as indicating that the person who performs the steps of FIG. 9 is a party distinct from a case manager and, thus, the user referred to in this section of Evans is this person who is not the "*user*" recited in the context of Claim 4.

In Claim 4, the term "*user*" is used in the context of a "*user interface element*," an "*application user interface*," and "*between an internet application and a user.*" Thus, "*user*" consistently refers to a user of the "*internet application*" who accesses the "*internet application*" through the "*application user interface.*" In this context, the "*user interface element having a user customizable property*" is a "*user interface element*" customizable by a user of the "*user interface.*" Because the party that performs the steps illustrated in Figure 9 of Evans and cited by the Examiner is a developer and not a user of the application, Evans does not teach a "*user interface element having a user customizable property.*"

Further, Claim 4 specifically refers to "*a developer*" that may specify the user interface element as distinct from a "*user*" who may use the "*user interface.*" The party referred to in the text of Evans cited by the Examiner appears to be performing tasks that would be associated with this "*developer*" rather than a "*user.*" For example, the "*developer*" of Claim 4 "*specif[ies] a user interface element*" and the party of Evans selects the activity fields for each activity to include in the CM database" (Col 13 line 60-65). In contrast with Claim 4, the Applicants are unable to find any teaching within Evans that once specified by a developer an interface element has a further "*user customizable*" property as recited in Claim 4. Therefore, it is again the position of the Applications that Evans does not teach a "*user interface element having a user customizable property.*"

The limitations of Claim 4 are further distinguished from the teachings of Evans by the fact that the "*internet application*" referred to on line 10 of Claim 4 is not the "*integrated development environment*" recited on line 3 of Claim 4. Specifically, the "*internet application*" is an application that can be accessed by a "*user*" using the "*application user interface*" that is specified by a developer using the "*integrated development environment*" (lines 3-6). The "*integrated development environment*" is used by a separate party, namely a "*developer to specify a user interface element.*" This difference further distinguishes the "*developer*" and "*user*" recited in Claim 4, and also characterizes the developer as having features similar to the so called "user" referred to in the discussion of Fig. 9 of Evans. Therefore, any customization taught in Evans merely teaches customization by the "*developer*" of Claim 4, and not the separate "*user*" of Claim 4.

It is the position of the Applications that Evans does not teach "*a data record being modifiable by a user of the internet application,*" wherein the "*data record [is] associated with*

the customizable property" as recited in Claim 4. As pointed out above, the user referred to in the text of Evans cited by the Examiner is not "*a user of the internet application.*" Therefore, the text cited by the Examiner is not applicable to this limitation of Claim 4. Further, the Applications have examined Evans, and while case managers are taught to modify data stored in patient databases, this data is associated with patients, doctors, or treatment plans, not with a "*user customizable property*" of a "*user interface element.*" It is not clear to the Applicants how patient data could be considered to be associated with a "*property*" of a "*user interface element,*" much less a "*user customizable property.*" The Applicants, therefore, request that the Examiner more specifically point out teaching of "*a user of the internet application*" modifying data in "*a data record associated with the customizable property*" as recited in Claim 4.

For at least the reasons discussed above the Applicants believe that Claim 4 and those claims that depend therefrom are in condition for allowance.

Regarding Claims 5, 6 and 8:

The Applicants believe that Claims 5, 6, and 8 are allowable for at least the reasons discussed above with regard to Claim 4 from which they depend.

Regarding Claim 7:

Claim 7 recites,

7. *(Previously Presented) The system of claim 4, wherein the integrated development environment is further configured to associate the user interface element with a procedure within the internet application.*

In reference to Claim 7, the Examiner states "the integrated development environment is further configured to associate the user interface element with a procedure within the internet application (Figure 8F3; *the add remove clear buttons are associated with procedures)*" (emphasis in original). The Applicants respectfully point out that the buttons shown in Figure

8F3 of Evans and referred to by the Examiner do not appear to be user interface elements "*having a user customizable property*" as recited in Claim 4. The Applicants are unable to identify any suggestion in Evans that these buttons are customizable by a user who is an end user. The Applicants, therefore, request that the Examiner specifically point out teachings within Evans that encompass all of the limitations of Claims 4 and 7, or allow Claim 7.

Claims 9, 11, and 12 are rejected under 35 U.S.C. 102(e) as being anticipated by Evans.

Regarding Independent Claim 9:

Claim 9 recites,

9. (Previously Presented) A system for developing an application user interface, the system comprising:
an integrated development environment configured for a developer to specify a user interface element in the application user interface, the user interface element having a user customizable property, the user customizable property being a response to a user input device, the application user interface being an interface between a user and an internet application;
a data repository including a data record configured to store a value characterizing the user customizable property, the value being user modifiable; and
an application designer configured to produce metadata for accessing the data record.

The Applicants believe that Claim 9 is allowable for at least the reasons discussed above with respect to Claim 4.

Further, it is the position of the Applicants that Evans does not teach "*the user customizable property being a response to a user input device,*" as recited in Claim 9. In regard to Claim 9, the Examiner suggests that Column 4 lines 13-17 of Evans teach this limitation of Claim 9. The cited text includes "[t]he user in step 940 indicates the order in which the activities engine 425 will list the fields. The order field is described in greater detail with reference to

TabOrder 646 of FIG. 6B." The section of Evans that describes "order field" in greater detail can be found at Column 11 lines 25-28, wherein it is taught that "Tab order 646 specifies the *display order* of each of the fields within each activity," (emphasis added).

As pointed out above with respect to Claim 4, the "user" in this section of Evans is a developer not a "*user*" in the context of Claim 4. Further, in Claim 9 the "*user*" is further characterized by the phrase "*user input device.*" It is the position of the Applicants that the "*user*" of the "*input device*" is the user that can customize the "*property.*" The Applicants are unable to find any teaching in Evans wherein the user of an "*input device*" to a "*user interface*" can also customize a response to that "*input device*" in the "*user interface.*" The Applicants, therefore, request that the Examiner specifically point out such a teaching or allow Claim 9.

In the text at Column 11 lines 25-28 of Evans, which is not cited by the Examiner, "[t]ab order 646" is further described as specifying a "display order of each of the fields." It is the position of the Applicants that the term "tab order" is used as a euphemism for element display order in Evans because Evans uses a default approach wherein the tab key is always configured to shift focus between fields in the order in which they are displayed. Thus, the customization taught in Column 14 lines 13-16 is no more than a customization of "[t]he order in which the activities engine 425 will list the fields" (lines 13 & 14), and not customization of a "*response to a user input device*" as recited in Claim 9. In Evans, it appears that functionality of the tab key (or any other input device) is not modified. There is no teaching that the tab key will shift focus between interface elements (i.e., fields) in any order other than that in which they are displayed. Thus, Evans does not teach "*the user customizable property being a response to a user input device.*" In Evans the response is always the same. The tab key will shift focus to the next item in the display order. Otherwise, tab order could not be equated with display order. Because the

teachings of Evans appear to be limited to customizing display order, the Applicants respectfully request that the Examiner clarify how Evans teaches the "*the user customizable property being a response to a user input device.*" Further the Applicants request that the Examiner clarify how Evans teaches that this customization may be performed by a user of the "*user input device,*" or allow Claim 9.

Regarding Claim 11:

The Applicants believe that Claim 11 is allowable for at least the reasons discussed above with regard to Claim 9 from which it depends.

Regarding Claim 12:

Claim 12 recites,

12. (Previously Presented) The system of claim 9, wherein the customizable property is further responsive to an identity of the user.

With regard to Claim 12, the Examiner states "Evans discloses a system wherein the customizable property is further responsive to an identity of the user (Column 4 lines 31-35). The text cited by the Examiner includes:

> It will be appreciated that the client 135 may be configured to authenticate the user, provide access to only a corresponding set of functions, provide access to only a corresponding list of patient records, display selected data in a desired arrangement, etc.

It is the position of the Applicants that the cited text does no more than list a series of independent functions that may be performed by a client. Having fully reviewed Evans the Applicants are unable to find any evidence that "display selected data in a desired arrangement" is responsive to "authenticat[ion] of the user." In fact, text previously cited by the Examiner (e.g., the discussion of Figure 9) includes preparation of a desired display arrangement that is independent of user authentication.

Further, none of the features in the cited text appear to be associated with a "*response to an input device*," as recited in Claim 9.

The Applicants, therefore, request that the Examiner more specifically point out teachings of Evans that include a "*customizable property*" that is "*responsive to an identity of the user*," or allow Claim 12.

Claim Rejections under 35 USC § 103

The Applicants note that all of the rejections under 35 USC § 103 are based in part on Evans. Those comments made above with respect to Claims 4 and 9, therefore, also apply to the rejection of claims under 35 USC § 103.

Claims 6, and 10 were rejected under 35 USC § 103(a) as being unpatentable over Evans in view of Simonoff et al (U.S. Pat. No. 6,005,568).

The Applicants believes that Claims 6 and 10 are allowable for at least the reasons discussed above with respect to Claims 4 and 9 from which they depend. Even in combination the cited art does not teach all the limitations of the claims.

Claims 13-23, and 25-26 were rejected under 35 USC § 103(a) as being unpatentable over Evans in view of Castro ("HTML for the World Wide Web with XHTML and CSS: Visual QuickStart Guide, Fifth Edition).

Regarding Independent Claim 13:

Claim 13 recites,

13. (Previously Presented) A system for developing an internet application user interface, the system comprising an integrated development environment configured for specifying a user interface element in the internet application user interface, the user interface element having a user customizable tab-order property, the integrated development

environment including an application designer configured to produce metadata configured to characterize the customizable tab-order property.

The Applicants believe that Claim 13 is allowable for at least the reasons discussed above with respect to Claims 4 and 9.

Further, with regard to Claim 13, the Examiner admits that "Evans fails to disclose a user interface element having a user customizable tab-order property," and states "Castro teaches a system wherein the user interface element has a customizable tab-order property (Chapter 16 page 1 line 9) and further teaches metadata configured to characterize the customizable tab-order property (Chapter 16 Figure 16.57 line L; *tabindex being the metadata*)," (emphasis in original).

It is the position of the Applicants that Castro does not teach a "*user customizable tab-order property*" as recited in Claim 13. The text cited by the Examiner discusses setting tab-order in a web page using the metatag "TABINDEX." However, the Applicants are unable to identify any teaching that once tab order is set by a developer it can be later customized by a "*user*". In fact, the last line on the page cited by the Examiner teaches "[t]he first time your visitor hits the Tab key the Address or Location field ... gets the focus.... Then, the next tab brings the visitor where *you* say," (emphasis in original). The Applicants believe that the text "where *you* say" indicates that the developer is determining tab order and the visitor is a slave to this determination. This is directly counter to the suggestion that Castro teaches any user customization. In practice, it is well known that the TABINDEX metatag is a part of an HTML file set by a developer, and like most metatags is not user customizable. An advantage of some embodiments of the invention is that this normally static feature of a web page is user customizable.

The term "*user*" is used three times in Claim 13 and each of these references is with respect to a user of "*an internet application.*" Specifically, Claim 13 recites "*an internet*

application user interface," "*a user interface element*," and "*a user customizable tab-order property.*" All of these references characterize "user" as a user of the internet application, and not, for example, a user of the integrated development environment who sets up the internet application. Thus, the "*user*" of the context of Claim 13 is comparable with the "visitor" of Castro. In Claim 13 the "user" is capable of customizing the tab-order property, while in Castro the teachings appear to be counter to the idea that a visitor can modify tab-order.

In providing a motivation to combine the Examiner states "[m]otivation to do so would be that to make Evans' system further flexible for the users of the interface through tab-order." However, as pointed out above, the teachings of Castro give flexibility to developers not "users of the interface," as suggested by the Examiner. Thus, the motivation suggest by the Examiner does not seem possible by combining the teachings of the cited art.

The Applicants respectfully request that the Examiner more specifically point out a prior art teaching of a "*user customizable tab-order property*" in the Context of Claim 13, or allow Claim 13.

Regarding Independent Claim 14:

Claim 14 recites,

14. (Previously Presented) A system for developing an application user interface associated with an internet application comprising:
an integrated development environment configured for a developer to specify a user interface element in the application user interface, the user interface element having a user customizable tab-order property, the integrated development environment including an application designer configured to produce metadata to access a data record; and
a data repository including the data record for storing data characterizing the customizable tab-order property, the data being user modifiable.

The Applicants believe that Claim 14 is allowable for at least the reasons discussed above with respect to Claims 4, 9 and 13. Specifically, the cited art does not teach "*a user customizable tab-order property*" as recited in Claim 14.

Further, it is the Applicants' position that the cited art does not teach "*a data repository including the data record for storing data characterizing the customizable tab-order property, the data being user modifiable*" as recited in Claim 14.

Regarding Claim 14 the Examiner states "Evans discloses ... a data repository (Figure 2A item 155) including the data record for storing data characterizing the customizable tab-order property (Column 4 lines 6-8), the data being user modifiable (Column 13 lines 65-67). As discussed above with respect to Claims 4, 9, and 13, it is the position of the Applicants that the cited text does not teach that data characterizing the customizable tab-order property is user modifiable, the user being a user of the "application user interface." Rather the cited text merely teaches that properties of a user interface may be specified by a developer (e.g., an administrator).

Regarding Claims 15-18 and 23:

The Applicants believes that Claims 15-18 are allowable for at least the reasons discussed above with respect to Claim 14 from which they depend.

Regarding Claim 19:

Claim 19 recites,

19. (Previously Presented) *The system of claim 14, wherein the customizable tab-order property is configurable according to a class of user interface elements.*

Regarding Claim 19 the Examiner states "Castro teaches a system wherein the customizable tab-order property is configurable according to a class of user interface elements (Chapter 16 page 2 lines 12-13; *wherein all or none of the radio buttons can be assigned a tab-*

order for example)," (emphasis in original). The cited text includes "In a form, you can assign tab order to text fields, password fields, checkboxes, radio buttons, text areas, menus, and buttons."

It is the Applicants' position that the cited text teaches that tab-order can be assigned to elements of various classes but does not teach that assignments can be made "*according to a class*" as recited in Claim 19. For example, within the teaching of Castro it is conceivable that a developer could choose to set tab-order for all text areas by inserting a TABINDEX metatag within the HTML that defines each individual text box. The result would be that tab-order is set for the class of elements that are text boxes. However, Castro does not teach any method of doing so except individually setting the metatag associated with each text box. Thus, in Castro the process of setting of tab-order is still an element-by-element process and the tab-order property is configurable only on an element-by-element basis. It is the position of Applicants that this ability does not fit within the ordinary meaning of "*configurable according to a class.*" "[*C*]*onfigurable according to a class*" implies that the configuration process itself may be performed by class, in addition to or as an alternative to configuration on a mere element-by-element basis. The ability to configure according to class, as recited in Claim 19, is substantially different than an element-by-element configuration process that happens to result in configuration of a specific class as suggested by the Examiner.

In contrast, Claim 19 recites that the "*tab-order property is configurable according to a class of user interface elements.*" For example, a developer may choose to set tab-order for an entire class by referring to the class in a single operation. The Examiner is referred to at least paragraphs 82 and 109 of the application as filed for explanations of this process. Within the

context of Claim 19 the developer does not need to set the tab-order of each element individually. Rather he or she may do so "*according to a class of user interface elements.*"

The Applicants respectfully request that the Examiner more specifically point out prior art teaching setting of tab-order according to element class, or allow Claim 19.

Regarding Claim 20:

Claim 20 recites,

20. (Currently Amended) *The system of claim 14, wherein the customizable tab-~~over~~ order property is configurable according to the identity of a user.*

Regarding Claim 20 the Examiner states "Evans teaches a system wherein the customizable tab-order property is configurable according to the identity of the user (Column 4 lines 31-35). The text cited by the Examiner includes:

> It will be appreciated that the client 135 may be configured to authenticate the user, provide access to only a corresponding set of functions, provide access to only a corresponding list of patient records, display selected data in a desired arrangement, etc.

It is the Applicants' position that the cited text does not teach "*customizable tab-order property is configurable according to the identity of a user,*" as recited in Claim 20.

First, the Applicants believe that the cited text does no more than list a series of independent functions that may be performed by a client. Having reviewed Evans the Applicants are unable to find any evidence that "display selected data in a desired arrangement" is responsive to "authenticat[ion] of the user." In fact, text previously cited by the Examiner (e.g., the discussion of Figure 9) includes preparation of a desired display arrangement that is independent of user authentication. The Applicants, therefore, request that the Examiner more specifically point out teachings of Evans that include a "*customizable tab-over property*" that is "*configurable according to an identity of a user,*" or allow Claim 20.

Second, even if the cited text were misconstrued to suggest that "authentication of the user" was related to "display selected data in a desired arrangement," the Applicants are unable to identify any teaching in Evans that suggests that "authentication of the user" is related to tab-order, much less a tab-order that is *both* customizable by a user and configurable according to the identity of the user, as recited in Claims 20 and 14.

The Applicants therefore respectfully request that the Examiner specifically point out prior art teaching of a tab-order feature that is both "configurable according to the identity of a user" and "user customizable," the user being both associated with the identity and able to customize the tab-order property, or allow Claim 20.

Regarding Claim 21:

Claim 21 recites,

21. (Currently Amended) *The system of claim 14, wherein the customizable tab-~~over~~order property is configurable according to the identity of a client.*

Regarding Claim 21 the Examiner states "Evans teaches a system wherein the customizable tab-order property is configurable according to the identity of a client (Column 4 lines 45-51). The cited text includes:

> Each of the CM clients 135 may access the CM database 155, for example, to review the patients medical history or to review the conventional medical guidelines. Each CM client 135 will be configured according to the configuration data 310 stored in the CM database 155 and thus will maintain a consistent appearance *regardless of which terminal the case manager 155 uses.* (Emphasis added).

First, it is the position of the Applicants that this text teaches that the presentation of patients medical history is independent of which terminal is used to access the history. This teaching is the opposite of the limitations recited in Claim 21 which include that "*the customizable tab-order property is configurable according to the identity of a client,*" e.g. the presentation of data is dependent on which terminal is used to access data. The Applicants

respectfully point out that, in the context of the specification and Claim 21, the "*client*" is an access device (e.g., terminal), as distinct from a user of the access device.

Second, the text cited by the Examiner does not appear to be connected with a tab-order property. It is, therefore, the position of the Applicants that Evans does not teach client dependent functionality, much less a client dependent tab-order. Thus, even in combination, Evans and Castro do not teach the limitations of Claim 21.

Regarding Claim 22:

Claim 22 recites,

22. (Currently Amended) The system of claim 14, wherein the metadata is configured to characterize the tab-~~over~~ order property of a specific application component.

Regarding Claim 22 the Examiner states "Castro teaches a system wherein the metadata is configured to characterize the tab-over property of a specific application component (Chapter 16 page 1 line 9)." This text includes "In the form element's tag, type tabindex='n', where *n* is the number that indicates the tab order. It is unclear to the Applicants how this text teaches characterization of the tab-order property on the basis of application component. The Examiner is referred to the use of "application component" as used in the specification as filed. For example, paragraph 0043 includes "[a]n application component is a collection of user interface elements, associated application code, and other aspects of an internet application that perform a specific task or set of related tasks as part of an internet application," and provides some illustrative examples.

Regarding Claims 25 and 26:

Claim 25 recites,

25. (Previously Presented) The system of claim 14, wherein the data record includes a reference to an additional data record, the additional data record including additional data further characterizing the customizable tab-order property.

Regarding Claim 25, the Examiner states

> Official Notice is given that the user of an additional data record from a record of the first data record is well known in the art examples of which are: linked lists where a pointer points to an additional list or a structure with a reference element to another similar structure. Structures can reference each other and properties from structures follow with each structure, which is a defining property of a Structure. Therefore it would have been obvious to an artisan at the time of the invention to combine the additional data with Castro and Evans' system.

The Applicants traverse this statement. The data record referred to in Claim 25 is not just any data record, rather as recited in Claim 14 it is a "*data record for storing data characterizing the customizable tab-order property, the data being user modifiable.*" Further, the "*additional data record*" referenced from the "*data record*" includes "*additional data further characterizing the customizable tab-order property.*" The Applicants are unaware of a data record in the prior art configured for storing both "*data characterizing [a] customizable tab-order property*" and a reference to "*an additional data record*", much less where the "*additional data record*" includes "*additional data further characterizing the customizable tab-order property.*" These various limitations are not anticipated by mere linked lists as suggested by the Examiner. The Applicants, therefore, request that the Examiner provide specific examples supporting the Official Notice taken, that teach *all* of the limitations of Claim 25.

Other than as described in the specification as filed, it is not clear to the Applicants what "*additional data further characterizing the customizable tab-order property*" the Examiner has in mind when suggesting that the limitations of Claim 25 are taught by the prior art. The Applicants, therefore, also request that the Examiner also provide an example of prior art teaching "*additional data,*" "*further characterizing*" a "*customizable tab-order property,*" in addition to the TABINDEX metatag, or allow Claim 25 and Claim 26 which depends therefrom.

Claims 27-31 were rejected under 35 U.S.C. §103(a) as being unpatentable over Evans in view of Castro

Regarding Independent Claim 27:

Claim 27 recites,

27. (Previously Presented) A customizable application system comprising:
an internet application system configured to support an internet application;
an application user interface including a user interface element, the application user interface configured as an interface between the internet application and a user, the user interface element including a user customizable tab-order property, the user interface element configured for delivery to a client over a computer network;
metadata characterizing the customizable tab-order property; and
a data repository including a data record configured to store a value characterizing the customizable tab-order property, the value being user modifiable.

It is the position of the Applicants that Claim 27 is allowable for the reasons discussed above with respect to Claims 4, 9, 13 and 14. Specifically, Evans does not teach a tab-order property that is "*user customizable.*" In Claim 27 the user is specifically referred to in the text "*the application user interface configured as an interface between the internet application and a user.*" It is the position of the Applicants that the "*user*" referred to in "*user customizable*" is the end user of the internet application, not a developer or administrator of the application user interface. Thus, any customizability taught in Evans with regard to a developer or administrator is not applicable to the limitations of Claim 27.

Regarding Claim 28:

Claim 28 recites,

28. (Previously Presented) The customizable application system of claim 27, wherein the client is configured to display the application user interface using standard web browser protocols.

With regard to Claim 28, the Examiner admits "Evans fails to disclose an application system only using standard web protocols" and further states "[h]owever, Castro teaches an

application system wherein the client is configured to display the application user interface using standard web browser protocols." The Applicants respectfully point out that the teachings of Castro do not include a "*user customizable*" tab-order property as recited in Claim 27. Rather, the tab-order property taught in Castro appears to be static HTML that is ordinarily specified by a developer and then never changed. Thus, even if a property of Evans were user customizable, it is not clear how this customizability would be extended to the static tab-order property of Castro. There is a substantial difference between displaying a static tab-order property and a customizable tab-order property, using standard web browser protocols. Neither of the cited references teach how one would adapt the static HTML metatag taught in Castro to a "*user customizable*" system. It is, thus, the position of the Applicants that even in combination the cited art does not teach how one might use a static HTML metatag to display a user customizable property. Therefore, even in combination, the cited art does not teach displaying of an "*application user interface*" including "*a user customizable tab-order property*" using "*standard web browser protocols*," as recited in Claims 27 and 28. The Applicants respectfully request that the Examiner clarify how Castro teaches display of "*a user customizable tab-order property*" using "*standard web browser protocols*," or allow Claim 28.

Regarding Claim 29:

The Applicants believe that Claim 29 is allowable for at least the same reasons as discussed above with respect to Claim 28.

Regarding Claims 30 and 31:

The Applicants believe that Claims 30 and 31 are allowable for at least the same reasons as discussed above with respect to Claim 27.

Claims 41-45 were rejected under 35 U.S. C. §103(a) as being unpatentable over Evans in view of Castro

Regarding Independent Claim 41:

Claim 41 recites,

41. (Previously Presented) An internet application comprising:
a computer program configured to run on an internet application system;
an application user interface including a user interface element with a customizable tab-order property, the application user interface configured for delivery to a client and to operate as an interface between a user and the internet application;
a user modifiable data record stored in a location physically remote from the client, the data record configurable for use by a user interface generator to generate the application user interface, the data record further configurable to characterize the customizable tab-order property; and
metadata configurable for use by the user interface generator to access the user modifiable data record.

It is the position of the Applicants that Claim 41 is allowable for at least the reasons discussed above with respect to Claims 4, 9, 13, and 14. Specifically, Evans does not teach a tab-order property that is "*user customizable.*" In Claim 41 the user is specifically referred to in the text "*the application user interface configured for delivery to a client and to operate as an interface between a user and the internet application.*" It is the position of the Applicants that the "*user*" referred to in "*user customizable*" and "*application user interface*" is this user of the internet application, not a developer or administrator of the application user interface. Thus, any customizability taught in Evans is not applicable to the limitations of Claim 41.

Regarding Claim 42:

Claim 42 recites,

42. (Previously Presented) The internet application of claim 41, wherein the metadata includes a query.

With regard to Claim 42, the Examiner states "Evans discloses an internet application wherein the metadata includes a query (Column 15 lines 3-6)." The cited text includes "Method

1100 begins with the search engine 430 in step 1105 receiving a search query. The search query may be obtained from an edit window, where the case manager 115 enters various search parameters." The Applicants respectfully point out that the query discussed in the cited text is provide by a case manager for the purpose of retrieving patient records from a database. It, thus, does not appear to be included in "*metadata configurable for use by the user interface generator to access the user modifiable data record,*" as recited in Claim 41. The Applicants, therefore, respectfully request that the Examiner point out "*metadata configurable for use by the user interface generator to access the user modifiable data record,*" wherein "*the metadata includes a query*" and "*the user modifiable data record*" is "*configurable to characterize the customizable tab-order property,*" or allow Claim 42.

Regarding Claim 43:

Claim 43 recites,

43. (Previously Presented) The internet application of claim 41, wherein the data record is further configured such that generation of the application user interface is responsive to an identity of the client.

It is the position of the Applicants that Claim 43 is allowable for at least the reasons discussed above with respect to Claim 41 and Claim 21.

Regarding Claim 44:

Claim 44 recites,

44. (Previously Presented) The internet application of claim 41, wherein the data record is further configured such that generation of the application user interface is responsive to an identity of the user.

It is the position of the Applicants that Claim 44 is allowable for at least the reasons discussed above with respect to Claim 41 and Claim 12.

Regarding Claim 45:

Claim 45 recites,

45. (Previously Presented) The internet application of claim 41, wherein the data record is configurable using a configuration interface.

With regard to Claim 45 the Examiner states "Evans discloses an internet application wherein the data record is configured using configuration interface (Figure 8H; *through the use of the edit element*)," (emphasis in original).

FIG. 8H of Evans is a "Group Privileges Screen" configured to specify privileges of various users in relation to a series of functions including "Activities, Cases, HSQ, Letters, Questionnaires, Related Parties, Related Providers, and Reports." At column 6 lines 12-19 Evans teaches that the Group Privileges Screen is configured to determine access privileges to CM database 155. Further, CM database 155 is characterized in Column 5 lines 32-35 as "patient data 305, which includes patient records for each of the patients assigned to the case managers 115 accessing the particular database 305." Thus, the edit element referred to by the Examiner is configured for editing access privileges to patient data.

It is the position of the Applicants that the cited text has no relation to a data record "*configurable to characterize the customizable tab-order property*" as recited in Claim 41. The Applicants, therefore, request that the Examiner clarify how the cited text relates to "*the customizable tab-order property*" and how an edit privilege regarding access to patient data teaches a "*configuration interface*" that can be used to edit a "*data record*" "*configurable to characterize the customizable tab-order property*," or allow claim 45.

Claims 46-48, and 50 were rejected under 35 U.S.C. §103(a) as being unpatentable over Castro in view of Evans.

Regarding Independent Claim 46:

Claim 46 recites,

46. (Previously Presented) An application user interface between a user and an internet application, the application user interface including a user interface element, the application user interface further being generated using metadata and being configured for display using a standard web browser, the metadata being configured to access a user modifiable data record that includes a value characterizing a user customizable tab-order property, the user interface element including the user customizable tab-order property.

It is the position of the Applicants that Claim 46 is allowable for the reasons discussed above with respect to Claims 4, 9, 13, 14 and 28. Specifically, any tab-order properties taught by Evans and Castro may be specified by a developer, but once specified are fixed and are not "*user customizable.*" This is because, the "*user*" in the context of Claim 46 is characterized by the first line of Claim 46 as a party who uses the "*application user interface*" to access "*an internet application*" and is, thus, distinct from a developer of the application user interface.

Further, the Applicants are unable to identify any teaching within the cited art that an "*application user interface*" including "*a user configurable tab-order property*" is "*configured for display using a standard web browser.*" As discussed with regard to Claim 28, the metatag taught by Castro and cited by the Examiner is not user configurable, and the text cited in Evans does not teach a display using a standard web browser. The Applicants request that the Examiner specifically point out how these teachings could be combined to achieve a configurable tab-order feature configured for display using a standard web browser, or allow Claim 46.

Regarding Claim 47:

Claim 47 recites,

47. (Currently Amended) The application user interface of claim 46, wherein the value characterizing a user customizable tab-order property is ~~dependant~~ dependent on an identity of a user of the application user interface.

It is the position of the Applicants that Claim 47 is allowable for at least the reasons discussed with respect to Claim 46 and Claim 12.

Regarding Claim 48:

Claim 48 recites,

48. (Previously Presented) The application user interface of claim 46, wherein the user customizable tab-order property includes tab-over configurable to be responsive to a class of user interface elements.

It is the position of the Applicants that Claim 48 is allowable for at least the reasons discussed with respect to Claim 46 and Claim 19.

Regarding Claim 50:

It is the Applicants position that Claim 50 is allowable for at least the reasons discussed with respect to Claim 46.

Claims 53-58 were rejected under 35 U.S.C. 103(a) as being unpatentable over Evans in view of Castro.

Regarding Independent Claim 53:

Claim 53 recites,

53. (Previously Presented) A method of developing a user interface element, the method comprising the steps of:
selecting a customizable property;
including the customizable property in the user interface element;
determining a data record for holding a value to characterize the customizable property, the data record being stored in a data repository and being user modifiable, the data repository being physically remote from a client used to display an HTML based application user interface;
generating metadata further characterizing the customizable property, the metadata including a reference to the data record; and
storing the metadata in association with the user interface element, the user interface element being configurable for inclusion in the HTML based application user interface.

It is the position of the Applicants that Claim 53 is allowable for at least the reasons discussed above with respect to Claims 4, 9, 13, and 14. Specifically, the "*user*" in the context of Claim 53 is not the so called "user" of the text cited in Evans by the Examiner. In Evans the term "user" is used to refer to a developer, while in the context of Claim 53 "*user interface element*" and "*user modifiable*" are both in reference to a user of an "*HTML based application user interface.*" Specification by a developer is substantially different from customization by a user. Evans, therefore, does not teach " user modifiable" as is used in the context of Claim 53. The Applicants therefore request that the Examiner cite teaching of "*determining a data record for holding a value to characterize the customizable property, the data record being stored in a data repository and being user modifiable, the data repository being physically remote from a client used to display an HTML based application user interface,*" wherein the user is a user of the application user interface, or allow Claim 53.

Further, with regard to Claim 53 the Examiner admits "Evans fails to disclose data used to display an html based application user interface. However, Castro teaches a method wherein the data repository being physically remote from a client used to display an HTML based application user interface (Chapter 16, "Figure 16.57)." However, Figure 16.57 shows use of the HTML metatag TABINDEX in a form that does not appear to be user customizable. As discussed above with regard to Claim 28, it is the position of the Applicants that applying the static property taught in Castro to a customizable system including a "customizable property," while still maintaining standard HTML compatibility, is not trivial and is not taught by either if the cited references. The Applicants therefore request that the Examiner cite specific teaching within the prior art of how this combination could be accomplished, or allow Claim 53.

Regarding Claims 54 and 56:

The Applicants believe that Claims 54 and 56 are allowable for at least the reasons discussed with respect to Claim 53 from which they depend.

Regarding Claim 55:

Claim 55 recites,

55. (Previously Presented) The method of claim 54, wherein the step of determining a data record is responsive to the identity of a user.

The Applicants believe that Claim 55 is allowable for at least the reasons discussed with respect to Claim 12, and Claim 53 from which it depends.

Regarding Claim 57:

Claim 57 recites,

57. (Previously Presented) The method of claim 54, wherein the customizable property includes a response to a user input device.

The Applicants believe that Claim 57 is allowable for at least the reasons discussed with respect to Claim 9, and Claim 53 from which it depends.

Regarding Claim 58:

Claim 58 recites,

58. (Previously Presented) The method of claim 53, wherein the customizable property includes tab-order.

The Applicants believe that Claim 57 is allowable for at least the reasons discussed with respect to Claims 13 and 14, and Claim 53 from which it depends.

Claims 59-63 are rejected under 35 U.S.C. §103(a) as being unpatentable over Evans in view of Castro.

Regarding Independent Claim 59:

Claim 59 recites,

59. (Previously Presented) A method of developing an application user interface associated with an internet application, the method comprising the steps of:

selecting a user customizable user interface element associated with a data record, the data record being stored in a data repository and being user modifiable, the data repository being physically remote from a client used to display the application user interface;

including the user customizable user interface element in the application user interface;

generating metadata characterizing the user customizable user interface element, the metadata including a reference to the data record; and

storing the metadata in association with the internet application, the internet application being configured for access using the application user interface.

It is the position of the Applicants that Claim 59 is allowable for at least the reasons discussed above with respect to Claims 4, 9, 13, and 14. Specifically, the "*user*" in the context of Claim 59 is not the "user" of the text cited in Evans by the Examiner. Thus, Evans does not teach a "*data record*" characterizing a *"user customizable user interface element."*

Further, with regard to Claim 59, the Examiner states "Evans discloses ... generating metadata characterizing the user customizable user interface element (column 13 lines 65-67), the meta data including a reference to the data record (Column 2 lines 28-30)." The cited text includes "[t]he user in step 915 identifies the field types and control types 650 (see FIG. 6B), and in step 920 identifies the field sizes and numLines 656 (see FIG. 6B)," and "[f]or example, the list view engine may retrieve the column header information specifying the information that should be presented in the patient record window." The Applicants are unclear as to how the cited text teaches "*generating metadata characterizing the user customizable user interface element, the metadata including a reference to the data record.*" For example, it is not clear which aspect of the cited text the Examiner considers to teach the act of "*generating.*" The first citation teaches identification of types and sizes, while the second citation teaches retrieval of information. The Applicants, therefore, respectfully request that the Examiner more specifically point out how the cited text teaches "*generating metadata characterizing the user customizable*

user interface element, the metadata including a reference to the data record" within the context of Claim 59, or allow Claim 59.

Regarding Claim 60:

Claim 60 recites,

60. (Previously Presented) The method of claim 59, wherein the application user interface is generated responsive to the identity of a requestor.

It is the position of the Applicants that Claim 60 is allowable for at least the reasons discussed with respect to Claims 59, 12 and 20.

Regarding Claim 61:

It is the position of the Applicants that Claim 61 is allowable for at least the reasons discussed with respect to Claim 59.

Regarding Claim 62:

It is the position of the Applicants that Claim 62 is allowable for at least the same reasons discussed with respect tot Claim 59 and Claim 9.

Regarding Claim 63:

It is the position of the Applicants that Claim 63 is allowable for at least the same reasons discussed with respect tot Claims 59, 13, and 14.

Claims 64-69 are rejected under 35 U.S.C. 103(a) as being unpatentable over Evans in view of Castro.

Regarding Independent Claim 64:

Claim 64 recites,

64. (Previously Presented) A method of generating an application user interface, the method comprising the steps of:
accessing a page definition, the page definition including metadata for defining a user customizable property of the application user interface;

obtaining a reference to a user modifiable data record, using the metadata;
accessing the user modifiable data record using the reference, the data record being stored in a data repository physically remote from a client used to display the customized application user interface;
reading the data record to determine a value characterizing the user customizable property;
generating markup-language responsive to the value; and
including the generated markup-language in the application user interface.

It is the position of the Applicants that Claim 64 is allowable for at least the reasons discussed with respect to Claims 4, 9, 13 and 14.

Further, with regard to Claim 64, the Examiner states "Evans discloses ... obtaining a reference to a user modifiable data record, using the metadata (Column 2 lines 28-30)." The cited text includes "the list view engine may retrieve the column header information specifying the information that should be presented in the patient records window." However, the Applicants are unable to identify any teaching within the cited art that "column header information" is "*metadata for defining a user customizable property of the application user interface*," as recited in Claim 64.

It is also not clear to the Applicants which aspect of the cited art the Examiner believes teaches "*obtaining a reference to a user modifiable data record.*" For example, the "column header" does not appear to be modifiable by the user accessing the information. The Applicants, therefore, respectfully request that the Examiner specifically point out an obtainable "*reference*" "*to a user modifiable data record*" within the cited art.

Further, with regard to Claim 64 the Examiner admits:

> Evans also fails to disclose a method of access page definitions using metadata. However Castro discloses accessing a page definition (Chapter 16 Figure 16.57), the page definition including metadata for defining a user customizable property of the application user interface (Chapter 16 Figure 16.57 line L; *tabindex being metadata*).

The Applicants respectfully point out that the tabindex value shown in Figure 16.57 is set by a page developer and does not appear to be "*for defining a user customizable property of the application user interface*," as recited in Claim 64. As discussed above with respect to Claim 28, the TABINDEX metatags (and associated values) taught by Castro do not appear to be user customizable. It is, therefore, the position of the Applicants that Evans and Castro, even combination, do not teach these claim limitations.

Further, with regard to Claim 64, the Examiner states

> Evans also fails to disclose a method where generating markup-language responsive to the value and including the generated markup-language in the application user interface. However, Castro teaches a method where generating markup-language responsive to the value (Chapter 16 page 2 lines 6-10); and including the generated markup-language in the application user interface (Chapter 16 Figure 16.57).

The Applicants traverse this statement. The cited text illustrates the inclusion of a static metatag within HTML but does not teach generation of the HTML other than by manual programming. Specifically, Castro does not teach "*generating markup-language responsive to the value*" where the value has been determined by reading a data record as recited in Claim 64. The Applicants, therefore, request that the Examiner more specifically point out teachings within the cited text that the metatag of Castro is generated responsive to a value read from a data record, or allow Claim 64.

Regarding Claims 65-69:

It is the position of the Applicants that Claims 65-69 are allowable for at least the reasons discussed with respect to Claim 28, and Claim 64 from which they depend.

Claims 70-72, 74 were rejected under 35 US.C. §103(a) as being unpatentable over Castor and Evans.

It is the position of the Applicants that Claims 70-72 and 74 are allowable for at least the reasons discussed with respect to Claims 4, 9, 13, 14, 15, and 29.

Claims 75-79 were rejected under 35 U.S.C. §103(a) as being unpatentable over Castro and Evans.

It is the position of the Applicants that Claims 75-79 are allowable for at least the reasons discussed with respect to Claims 4, 9, 12, 13, 14, 15, 19, and 28.

Claims 80, 81, 83, and 84 were rejected under 35 U.S.C. §103(a) as being unpatentable over Castro and Evans.

It is the position of the Applicants that Claims 80, 81, 83, and 84 are allowable for at least the reasons discussed with respect to Claims 4, 9, 12, 13, 14, 15, and 28.

Claims 85-90 were rejected under 35 U.S.C. §103(a) as being unpatentable over Castro and Evans.

Regarding Independent Claim 85:

Claim 85 recites,

85. (Previously Presented) A method of generating an application user interface including a customizable tab-order property, the method comprising the steps of:
accessing a page definition, the page definition including metadata characterizing the customizable tab-order property;
reading a value from a data record using the metadata, the data record being stored in a data repository physically remote from a client used to display the application user interface, the value being user modifiable and further characterizing the customizable tab-order property;
generating HTML responsive to the value; and
including the HTML in the application user interface, the application user interface being an interface to an internet application.

It is the position of the Applicants that Claims 85 is allowable for at least the reasons discussed with respect to Claims 4, 9, 13, 14 and 64.

Further, with regard to Claim 85, the Examiner states "Castro discloses ... accessing a page definition, the page definition including metadata characterizing the customizable tab-order property (Chapter 16 Figure 16.57 line L); *tabindex being the metadata*);" (emphasis in original). The Examiner further states:

> Castro fails to teach reading a value from a data record using the metadata, the data record being stored in a data repository physically remote from a client used to display the application user interface. However, Evans teaches a method reading a value from a data record using metadata (Column 13 lines 65-67), the data record being stored in a data repository physically remote from a client used to display the application user interface (Column 4 lines 43-44). Therefore it would have been obvious to an artisan at the time of the invention to combine Castro's method with Evans teaching.

The Applicants traverse these statements on at least the basis that the combination suggested by the Examiner is unworkable. For example, the TABINDEX metadata of Castro, which the Examiner cites as being the "*metadata*" could not be used for "*reading a value from a data record using the metadata, the data record being stored in a data repository physically remote from a client.*" As shown in the figures of Castro, TABINDEX is a static element including the "TABINDEX" metatag and an integer value. The Applicants fail to see how the metatag or the integer value could be used for "*reading a value from a data record...*" as recited in Claim 85. The metatag TABINDEX is merely a metatag associated with a static value and not a link or reference to other data "*stored in a data repository*," so the metatag cannot be used for "*reading a value from a data record.*" The integer value associated with the metatag is a simple integer such as 1, 2 or 3 and, thus, also cannot be used for "*reading a value from a data record.*" Finally, the metatag TABINDEX is not used for reading the associated integer value because both are typically read from a file at the same time. Therefore, the teaching of Castro that the Examiner identifies as the metadata could not be used within the teachings of Evans to read a

remote data record. Thus, even in combination, the cited text does not teach the limitations of Claim 85.

Further, with regard to Claim 85, the Examiner states "Castro discloses ... generating HTML responsive to the value (Chapter 16 Figure 16.57)." It is not clear to the Applicants how Figure 16.57 teaches generation of HTML (other than by manual programming). Figure 16.57 appears to show HTML not the generation of HTML. While other sections of Castro discuss the preparation of HTML, these discussions are all in reference to manual programming. Therefore, it is not clear to the Applicants how any generation of HTML taught in Castro is "responsive to the value," read from the "*data record*" as recited in Claim 85. The Applicants, therefore, request that the Examiner more specifically point out how the cited art teaches these aspects of Claim 85 or allow Claim 85.

Regarding Claims 86-89:

It is the position of the Applicants that Claims 86-89 are allowable for at least the reasons discussed with respect to Claims 15, and 28, as well as Claim 85 from which they depend.

Regarding Claim 90:

Claim 90 recites,

90. (Previously Presented) The method of claim 85, further including identifying a requestor of the application user interface, wherein the step of reading a value is responsive to an identity of the requestor.

With regard to Claim 90 the Examiner states:

> Castro fails to disclose a method wherein the step of generating the application user interface is responsive to an identity of a user. However, Evans teaches such a method wherein the step of generating the application user interface is responsive to an identity of a user (Column 4 lines 31-35).

First, as discussed above with respect to Claim 12, it is the position of the Applicants that the cited text does not teach "generating the application user interface is responsive to an identity of a user." Rather, the cited text merely teaches that a user may be authenticated.

Second, even if Evans were to teach "a method wherein the step of generating the application user interface is responsive to an identity of a user," this does not teach "*wherein the step of reading a value is responsive to an identity of the requestor*," as recited in Claim 90. The Applicants respectfully request that the Examiner clarify how "a method wherein the step of generating the application user interface is responsive to an identity of a user" necessarily teaches "*wherein the step of reading a value is responsive to an identity of the requestor*," ("*the value being user modifiable and further characterizing the customizable tab-order property*") or allow Claim 90.

Third, as pointed out above with respect to Claim 85, the Examiner points to the metatag "TABINDEX" and the associated integer as teaching the "*metadata*" as used in Claims 85 and 90. It is unclear to the Applicants how used of "TABINDEX" and an integer could be used to read "*a value ... responsive to an identity of the requestor*" as recited in Claims 85 and 90. The Applicants, therefore, respectfully request that the Examiner point out prior art teachings of how the suggested combination of Castro and Evans could work, or allow Claim 90.

Claims 94 and 95 were rejected under 35 U.S.C. §103(a) as being unpatentable over Evans in view of Castro.

It is the position of the Applicants that independent Claims 94 and 95 are allowable for at least the reasons discussed with respect to Claims 4, 9, 13, 14, 34 and 41.

Claim 96 was rejected under 35 U.S.C. §103(a) as being unpatentable over Castro in view of Evans.

It is the position of the Applicants that independent Claim 96 is allowable for at least the reasons discussed with respect to Claims 4, 9, 13, 14, 53, and 85.

Claim 24 was rejected under 35 U.S.C. 103(a) as being unpatentable over Castro and Evans in view of Regnier et al. (U.S. Patent No. 6,134,549).

Regarding Claim 24:

Claim 24 recites,

24. (Currently Amended) The system of claim 14, wherein the data is user modifiable using a personalization system integrated into the internet application.

With regard to Claim 24 the Examiner states "Regnier teaches a system wherein the data is user modifiable using a personalization system integrated into the internet application (Column 6 lines 64-67)." The Applicants traverse this statement. The personalization system of Regnier is in the context of database views. The Applicants respectfully remind the Examiner that personalization of a database view is related to which data within a database is accessed or manipulated by a user and may have nothing to do with a display interface used to access that data. The Applicants are unable to identify any teaching within Regnier that the personalization extends to an application user interface of an internet application. Thus, even in combination with Evans and Castro the teachings of Regnier do not appear to include all the limitations of Claim 24.

Further, the "*data*" of Claim 24 is "*data characterizing the customizable tab-order property*" as recited in Claim 14. The Applicants are unable to identify any teaching within the cited art of how personalization of database views is the same as "data characterizing the

customizable tab-order property," as suggested by the Examiner. This distinction is non-trivial. The Applicants, therefore, request that the Examiner specifically point out teaching of how the suggested combination would be achieved.

Further, Regnier teaches that personalization is performed by a system administrator (Column 7 lines 48-51), rather than a "*user*" as in Claim 24. As discussed with respect to Claim 14, the "*user*" in the context of the claim limitations is a user of the "*application user interface.*" It is, therefore, the Applicants' position that Regnier does not teach the "*user modifiable*" limitation of Claim 24.

With respect to motivation to combine the cited art, the Examiner states "that both systems are configurable interfaces, which are based upon data repositories. Each of the systems include networks dedicated for customization of data using metadata." The Applicants traverse this statement.

First, the system of Evans is for a developer to configure a visual application interface that will be displayed to a user, while the system of Regnier is a database view personalization system that may have nothing to do with a visual application interface. Thus, the similarities suggested by the Examiner are not supported by the cited art.

Second, the similarities suggested by the Examiner, even if true, would not constitute a motivation to combine, particularly when compared with the many dissimilarities (e.g., the widely different purposes and subject matters). It is the position of the Applicants that the presence of a few features in common is not proper grounds for a motivation to combine. Those features that are similar are features of many different kinds of computing systems and are, thus, not features that would lead a person to combine these two references from diverse fields of art. The Applicants, therefore, respectfully request that the Examiner point out motivation to

combine the specific elements of the cited art and, further, that this motivation be provided from within the cited art as required for a proper rejection under §103.

Claims 32-33 were rejected under 35 U.S.C. 103(a) as being unpatentable over Castro and Evans in view of Regnier.

It is the position of the Applicants that Claims 32 and 33 are allowable for the reasons discussed with respect to Claims 14 and 24, as well as Claim 27 from which they depend.

Claim 49 was rejected under 35 U.S.C. 103(a) as being unpatentable over Castro and Evans in view of Regnier.

It is the position of the Applicants that Claim 49 is allowable for the reasons discussed with respect to Claims 14 and 24, as well as Claim 46 from which it depends.

Claim 73 was rejected under 35 U.S.C. 103(a) as being unpatentable over Castro and Evans in view of Regnier.

It is the position of the Applicants that Claim 73 is allowable for the reasons discussed with respect to Claims 14 and 24, as well as Claim 70 from which it depends.

Claim 82 was rejected under 35 U.S.C. 103(a) as being unpatentable over Castro and Evans in view of Regnier.

It is the position of the Applicants that Claim 82 is allowable for the reasons discussed with respect to Claims 14 and 24, as well as Claim 80 from which it depends.

Claims 91-93 were rejected under 35 U.S.C. 103(a) as being unpatentable over Regnier in view of Castro.

Regarding Independent Claim 91:

It is the position of the Applicants that Claim 91 is allowable for at least the reasons discussed with respect to Claims 4, 9, 13, 14, 24, 80, 84 and 85.

Regarding Claims 92 and 93:

It is the position of the Applicants that Claims 92 and 93 are allowable for at least the reasons discussed with respect to Claims 15 and 28, in addition to Claim 91 from which they depend.

Claims 34-36, 39-40 were rejected under 35 U.S.C. 103(a) as being unpatentable over Castro in view of Simonoff et al. (U.S. Patent No. 6,005,568).

Regarding Independent Claim 34:

Claim 34 recites,

34. (Previously Presented) An internet application system comprising:
a user interface generator configured to generate a user interface including a user interface element, the user interface being compatible with a standard web browser and being generated in response to a request from a user, the user interface element including a user customizable tab-order property;
a web application server configured to deliver the user interface to a client; and
an internet application accessible to the user through the generated user interface.

It is the position of the Applicants that Claim 34 is allowable for at least the reasons discussed with respect to Claims 4, 9, 13, 14 and 28.

Further, with regard to Claim 34 the Examiner states "Castro discloses an internet application system comprising: a user interface generator (Chapter 16 Figure 16.57); *HTML being* generator)." The Applicants traverse this statement and respectfully point out that HTML is a language for representing an interface that can be interpreted by a browser. HTML is not "*a user interface generator*" as suggested by the Examiner. Rather, a user interface may be generated in an HTML representation for use by a browser. The Applicants respectfully point out that it appears that the Examiner is pointing to the HTML shown in Figure 16.57 as teaching

both "a user interface generator" and "the user interface." As stated above with respect to Claim 64, Castro does not appear to teach any method of generating an HTML representation of an interface, other than manual programming.

Regarding Claims 35, 36, 39 and 40:

It is the position of the Applicants that Claim 35, 36, 39 and 40 are allowable for at least the reasons discussed with respect to Claims 4, 9, 13, 14, and 15, as well as Claim 34 from which they depend.

Claims 37 and 38 were rejected under 35 U.S.C. 103(a) as being unpatentable over Castro and Simonoff further in view of Evans.

Regarding Claim 37:

Claim 37 recites,

37. (Previously Presented) The internet application system of claim 34, wherein the user interface generator is further configured to use metadata for characterizing the tab-order property, the metadata including a reference to a data record, the data record including a user defined parameter.

It is the Applicants' position that Claim 37 is allowable for at least the reasons discussed with respect to Claims 85 and 90, as will as Claim 34 from which it depends. Specifically, as discussed above with respect to Claim 85, it is the Applicants position that the combination suggested by the Examiner is unworkable. For example, the tabindex of Castro, which the Examiner cites as being the "*metadata*" does not include "*a reference to a data record, the data record including a user defined parameter*" as recited in Claim 37. Further, the cited references do not teach how the static tabindex of Castro could be adapted to include a "*reference to a data record.*" Therefore, the teaching of Castro that the Examiner identifies as the metadata could not

be used within the teachings of Evans to reference a "*data record including a user defined parameter*," as recited in Claim 37. Thus, even in combination the cited text does not teach the limitations of Claim 37.

Regarding Claim 38:

Claim 38 recites,

38. (Previously Presented) The internet application system of claim 34, wherein the user interface generator is configured to use a user modifiable data record for characterizing the tab-order property.

It is the Position of the Applicants that Claim 38 is allowable for at least the reasons discussed with respect to Claims 4, 9, 13, and 14, in addition to Claim 34 from which it depends. Specifically, the "*user*" of "*user modifiable data record*" as recited in Claim 38 is in reference to the user of the "*user interface*" and is the user referred to in "*generated in response to a request from a user*," as recited in Claim 34, and is not a developer or administrator as in the cited art. The Applicants respectfully request that the Examiner cite prior art that teaches that "*data record for characterizing the tab-order property*" is "*modifiable*" by a "*user*" in this context, or allow Claim 38.

Claim 51 was rejected under 35 U.S.C. 103(a) as being unpatentable over Evans and Simonoff in view of Castro.

Regarding Independent Claim 51:

Claim 51 recites,

51. (Previously Presented) A customizable application system comprising:
an internet application system configured to support an internet application, the internet application including metadata configured for generating an application user interface with a user interface element, the internet application system including,
a) an application server configured to generate the application user interface, and

b) a web application server configured to deliver the application user interface to a client;

an application development system configured to generated the metadata, the metadata being further configured to access configuration data characterizing a tab-order property of the user interface element;

a configuration system including a configuration engine and a configuration interface, the configuration interface configured to modify the configuration data;

a data repository including a data record for storing the configuration data, the data record being accessible using the metadata.

It is the position of the Applicants that Claim 51 is allowable for at least the reasons discussed above with respect to Claims 4, 9, 13, 14, 64 and 85. For example, for reasons similar to those discussed in reference to Claim 85, the metadata taught by Evans and Castro is not "*configured to access configuration data characterizing a tab-order property.*" In the case of Evans the metadata is configured to specify which patient data records should be displayed to a client, and in the case of Castro the metadata is a static metatag and integer value. Therefore, the cited art, even in combination, does not teach how the static tag of Castro could be modified to work in the database environment of Evans.

Claim 52 was rejected under 35 U.S.C. 103(a) as being unpatentable over Castro and Simonoff in view of Regnier.

Regarding Independent Claim 52:

Claim 52 recites,

52. (Previously Presented) A customizable application system comprising:

an internet application system configured to support an internet application, the internet application associated with metadata configured for generating an application user interface including a plurality of user interface elements having a tab-order property, the internet application system including,

a) an application server configured to generate the application user interface, and

b) a web application server configured to deliver the application user interface to a client;

a personalization system including a personalization engine and a user profile interface, the personalization interface configured for modification of personalization data characterizing the tab-order property such that the tab-order of the plurality of user interface elements is modified; and

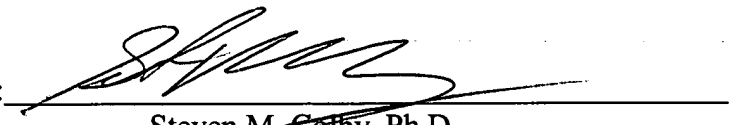
a data repository including a data record for storing the personalization data, the data record being accessible using the metadata.

It is the position of the Applicants that Claim 52 is allowable for at least the reasons discussed with respect to Claims 4, 9, 13, 14, and 24. For example, as discussed in respect to Claim 24, the personalization taught by Regnier is not applicable to the system of Claim 52 because the personalization in Regnier is in regard to database views, a subject area that deals with the scope of queries or other database operations and may have nothing to do with the layout or functionality of application user interfaces. Database views in the context of Regnier are in a vastly different area of technology and are therefore distinctly different from the presentation of data to a user through an interface.

The Examiner is respectfully requested to enter this Amendment and to examine the pending claims. The Examiner is respectfully urged to consider the claimed invention at the earliest time possible and issue a favorable action indicating the application is in condition for allowance. If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone Applicants' undersigned representative at the number given below.

Respectfully submitted,

Allan Ballard et al.

Date: December 10, 2004 By: 

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